

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KING RANGE, JR.,  
Plaintiff,

v.

FLEMINGTON ESTATES LLC and  
FRANKIE SHOP, LLC,  
Defendants.

Case No: 1:25-cv-02633-MMG

**NOTICE OF MOTION**

**DEFENDANTS FRANKIE SHOP LLC'S  
NOTICE OF MOTION TO DISMISS THE COMPLAINT**

**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Frankie Shop LLC., upon their accompanying Memorandum of Law and all prior pleadings and proceedings herein, move this Court before the Honorable Margaret M. Garnett for an order dismissing Plaintiff's claims in the amended Complaint (ECF No. 21) as alleged against Defendant Frankie Shop LLC. in their entirety, with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: July 25, 2025

Respectfully submitted,

/s/ Jonathan S. Hong

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